



Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

RE: Business Opportunity Rule, R511993

Dear Sir or Madam:

I am writing this letter because I am concerned about the proposed Business Opportunity Rule R511993. I believe that in its presented form, it could prevent me from continuing as a consultant for the MLM/Network Marketing Industry, and destroy our small business.

I originally started as a distributor part time in 1968 while still in college. I became a distributor because of the products. I loved them and wanted to earn some additional money to work my way through school.

I have also been a consultant to the Network Marketing industry for more than 14 years. I started my consulting company to assist Network Marketing companies stay within the guidelines set forth by our government. I am not only retired from the United States Army, but handicapped as well. My family fully depends on this income to provide a majority of our family budget. Please don't use this unnecessary Rule to destroy our small business! We need it! The Heartbeat of American Business is Small Businesses, many of which are Home Based.

Some of the sections in the proposed rule would make it virtually impossible for distributors to sell their product and operate their Home Based Businesses.

The waiting period will give the public the idea that there's something wrong with me or the companies I provide my services to. I also think this seven-day waiting period is unnecessary, because many of my clients already have a 100% buyback policy.

One of the most difficult sections of the proposed rule is the seven-day waiting period to enroll a new Distributor. Most membership and sales kits cost under \$100.00. People buy lunch, dinner, TVs, cars, and other items that cost much more than that and they don't have to wait seven-days. I am a small home business and this burden will hurt or destroy my business. This proposed rule is actually anti-small business.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. I am glad to provide references, but in this day of identity theft, I am very uncomfortable giving out the personal information of individuals (without their approval) to strangers. Women in my organization may be subject to sexual or racial harassment so this part can't go in at all, unless the FTC passes an addition to this rule prohibiting sexual or racial attacks related to this disclosure. In the end, the rule must bind the FTC to take direct enforcement action on sexual and racial attacks with a special unit assigned to monitor actions related to the disclosure forms.

I have seen many scams on the Internet and been approached by many crooks because of my success. This rule will do nothing to stop them. It will actually hurt my business! This rule will not stop Crooks – they violate the current rule all the time. However, I am a good American citizen and it will hurt me.

Thank you in advance for your attention to and favorable consideration of this request.

Sincerely,

Rod Cook, President  
America's MLM Consultants